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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

THIS DOCUMENT RELATES TO:

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

*People of the State of California, et al. v. Meta
Platforms, Inc., et al.*

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**SUPPLEMENTAL MATERIALS TO
STATE ATTORNEYS GENERAL JURY
INSTRUCTIONS**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to the Court’s directive at the October 24, 2025 Case Management Conference, the
2 State Attorneys General submit the attached summary materials to assist the Court in structuring the
3 State Attorneys General’s upcoming jury trial. These materials are based on the amended complaint and
4 the proposed jury instructions filed on October 11, 2025, and focus exclusively on the state consumer
5 protection claims alleging unfair and deceptive trade practices. As directed, the materials do not address
6 affirmative defenses or penalties.

7 Regarding process, the State Attorneys General explored using AI tools, including ChatGPT and
8 Copilot, but found the results insufficient for the Court’s needs. As a result, the attached exhibits were
9 prepared directly by the attorneys in this case without the use of AI.

10 The State Attorneys General have attached two documents containing charts that outline the
11 consolidated elements for 'Unfairness' and 'Deception' claims under state consumer protection laws.
12 These charts categorize the claims to highlight areas of clear overlap. To further aid in visualizing this
13 information, the State AGs have also included corresponding maps that reflect the chart data.
14 Importantly, all states will rely on the same body of evidence to support their individual consumer
15 protection claims—no state will present separate or distinct evidence.

16 The Court also requested information on prior cases in which a multistate coalition of AGs
17 advanced to trial on consumer protection claims in a single proceeding. The State AGs regularly pursue
18 litigation wherein multiple states’ consumer protection or unfair and deceptive acts and practices
19 (“UDAP”) claims are litigated, including alongside state and federal antitrust claims. Typically, those
20 cases have resulted in settlements that obviated the need for trial. *See, e.g., Utah et al v. Google LLC*,
21 No. 3:21-cv-05227 (N.D. Cal. Juny 7, 2021) (Donato, J.); *Wisconsin et al v. Indivior*, No. 16-5073,
22 MDL No. 2445 (E.D. Pa. Sept. 22, 2016). In the private consumer class action case, *In re Pharm. Indus.*
23 *Average Wholesale Price Litig.*, 252 F.R.D. 83 (D. Mass 2008), now-Senior Judge Patty Saris of the
24 United States District Court for the District of Massachusetts engaged in a grouping analysis for
25 purposes of determining if a trial would be manageable in light of different states’ UDAP laws for
26 purposes of Rule 23 class certification. That opinion is attached for reference.

27 This case has been litigated as a unified action from the outset, and it should be tried as such. All
28 state consumer protection claims will be proven at trial through the same body of evidence, with no

1 claim requiring unique or state-specific proof. Trying claims separately would result in duplicative
2 presentation of the same evidence—an approach that is inefficient, impractical, and unnecessary. At this
3 late stage, any request for bifurcation should carry a heavy burden, and it is the Defendants’ obligation
4 to demonstrate that such a departure from the unified trial structure is warranted.
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DATED: 10/10/2025

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SIGNATURE CERTIFICATION

Under Civ. L.R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the
 filing is submitted, concur in this filing's content and have authorized this filing.

DATED: 10/10/2025

/s/ Krista Batchelder

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